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Fact Sheet for the Chairman,
Subcommittee on Public Lands,
Committee on Interior and Insular
Affairs, House of Representatives

December 1985

CULTURAL RESOURCES

Results of Questionnaire on State Historic Preservation Activities



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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

RESOURCES, COMMUNITY,
AND ECONOMIC DEVELOPMENT
DIVISION

December 10, 1985

B-125045

The Honorable John F. Seiberling
Chairman, Subcommittee on Public Lands
Committee on Interior and Insular Affairs
House of Representatives

Dear Mr. Chairman:

In your August 29, 1985, letter you requested that we look at responses made by federal agencies and state historic preservation offices (SHPOs) to your questionnaires addressing their historic preservation activities. This fact sheet summarizes the results of the questionnaire sent to the SHPOs. A separate fact sheet entitled Results of Questionnaire on Federal Agency Historic Preservation Activities (GAO/RCED-86-45FS), summarizes the responses made by federal agencies. As agreed with your office, in compiling this fact sheet, we included only the 32 SHPO responses received by the Subcommittee as of November 18, 1985. Another 12 SHPO responses had been received by December 5, 1985, but these were not included. The 44 SHPOs that responded are listed in appendix II.

The questionnaire consisted of 12 sets of questions, many of which called upon the SHPOs to describe, in narrative form, their preservation activities or their views on particular subjects. For most of the questions, the SHPOs did not provide responses that could be tabulated into clearly defined categories. Consequently, to best capture the wide range of the responses, we used a narrative format to summarize their views. However, where the responses could be tabulated in a "yes" or "no" fashion, we have done so. Finally, we made no contacts with the SHPOs to expand upon or clarify the information presented in their responses.

The SHPOs were consistent in their responses to questions concerning (1) the impact of cutbacks in federal financial support to historic preservation and (2) SHPO responsiveness to federal agency requests for comments on proposed projects. Concerning the first question, they believed that previous cutbacks in federal grants for acquisition and development have led to curtailed building rehabilitation efforts and the associated deterioration of historic structures. Further, some also believed that elimination of the remaining grant funds would cause the burden of

historic preservation activities to be shifted to federal agencies, likely at a higher cost to the federal government. With respect to SHPO responsiveness to agency requests for comments, the SHPOs stated that, for the most part, they provide comments in a timely manner. They attributed occasional instances where time deadlines were not met to the lack of adequate staff or federal agencies' not providing sufficient documentation concerning the planned project.

The SHPOs were less consistent in their assessments of the federal agencies' performance in fulfilling historic preservation responsibilities. Some SHPOs believed agencies such as the Department of Housing and Urban Development and the Army Corps of Engineers were poor performers while others believed these same agencies were especially good performers. Further, some SHPOs recognized that the quality of agency performance varied by location or installation within the same agency. For example, the Idaho SHPO identified one Forest Service unit as doing an especially good job and another unit as resisting compliance at every turn.

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this fact sheet until 30 days from its issue date. At that time, we will send copies to each of the SHPOs that responded to the questionnaire, the National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation. In addition, we will make copies available to other interested parties upon request. If you need further information, please contact me on 275-7756.

Sincerely yours,


Michael Gryzkowicz
Associate Director

RESULTS OF QUESTIONNAIRE ON STATE
HISTORIC PRESERVATION ACTIVITIES

This appendix provides detailed information on 32 State Historic Preservation Offices' (SHPOs') responses to the 12 sets of questions contained in the Subcommittee's questionnaire. The following two paragraphs highlight the responses that dealt with (1) identifying the federal agencies that are doing either a good or bad job in carrying out their historic preservation responsibilities and (2) the expected impacts that would result if historic preservation fund grants were discontinued.

The SHPOs identified 30 agencies as having done a good job in carrying out their historic preservation responsibilities and 32 agencies as having done a poor job.¹ COE, EPA, FmHA, FHWA, and FS were the agencies most frequently cited as having done a good job and GSA, HUD, USPS, and VA were most often cited as having done a poor job. However, there was no clear consensus among the SHPOs. Some SHPOs held certain agencies in high regard while others thought these same agencies were doing a poor job. Other SHPOs indicated the quality of some agencies' performance varied from one regional or district office to another.

Thirty-one of the 32 SHPO responses indicated that discontinuance of historic preservation fund grants would cause a drastic reduction or termination in the SHPO staff and the services they provide federal and state agencies. The programs or activities most frequently cited as the ones that would be cut or eliminated were

¹The abbreviations used to identify these federal agencies are set forth in appendix III.

- consultations and reviews of compliance with section 106 of the National Historic Preservation Act (NHPA),
- surveys and inventories of culturally significant sites,
- certifications of local government programs,
- state participation in the federal tax incentive project review process,
- National Register nominations, and
- state comprehensive historic preservation planning.

According to the SHPOs, if the states cut back or eliminated their current activities, the burden for performing many historic preservation tasks would be shifted back to the federal agencies. Several SHPOs stated that it would probably cost federal agencies more to perform these duties than would be saved by eliminating the grants.

We have rephrased the questions contained in the questionnaire to facilitate the categorization of the SHPOs' responses. To the extent practical, we also have identified the SHPOs responding to the questions. The abbreviations used to identify the SHPOs are explained in appendix II.

Question 1: What federal agencies or programs in your state do a good job in carrying out their historic preservation responsibilities?

Answer 1: Few clear trends emerged from the responses to this question. Some SHPOs held certain agencies in high regard while others thought these same agencies were doing a poor job. Other SHPOs indicated that the quality of some agencies' performance varied from one regional or district office to another and therefore could not be judged good or bad on an agencywide basis.

In total, the SHPOs identified 30 federal agencies as having done a good job in carrying out their historic preservation responsibilities. The agencies cited most often as having done a good job were COE, EPA, FS, FmHA, and FHWA. Appendix III shows how many times each federal agency was mentioned as having done a good job and/or a bad job. Some of the attributes ascribed to those agencies identified as doing a good job were the agency's cooperative attitude with the SHPOs, qualified historic preservation personnel, ability to provide adequate documentation of cultural resources, and willingness to exceed minimum section 106 requirements.

Three SHPOs (Nev, N.C., and Wyo.) did not believe any agency was doing a good job concerning historic preservation.

Question 2: What federal agencies or programs in your state are doing a poor job in carrying out their historic preservation responsibilities?

Answer 2: In total, the SHPOs identified 32 federal agencies as having done a poor job in carrying out their historic preservation responsibilities. However, once again it was difficult to establish a clear pattern from the SHPO responses to the question, for the same reasons as given under Question 1.

The agencies cited most often as having done a poor job were HUD, VA, USPS, and GSA. Other agencies singled out by SHPOs for poor performance were NPS, FS, OSM, and various COE district offices. Some of the criticisms ascribed to these agencies by the SHPOs were the inability to provide adequate information to determine the scope of the project, lack of historic preservation professionals, lack of compliance with section 106, poor cooperation with SHPOs, and a negative attitude toward historic preservation objectives.

Question 3a: Has the guidance and assistance you received from the Advisory Council on Historic Preservation been adequate?

Answer 3a: Yes - 24 (Miss., Wis., Ut., Md., N.D., N.Y., Mont., Oh., Minn., Ga., Id., Tenn., W.Va., Ia., S.D., Ark., Wash., Ala., Hi., Mass., Nev., N.J., R.I., and American Samoa)

No - 5 (Ill., Kans., La., Mich., and Wyo.)

No response to the question - 3 (Ariz., N.C.,
and Tex.)

Most of the SHPOs that responded held a favorable view of the assistance they have received from the Advisory Council. They described the assistance in terms of timely, comprehensive responses; useful guidelines; professionalism of the staff; and reasonable expectations and directions in resolving disputes.

Although most of the SHPOs' responses concerning Advisory Council assistance were favorable, a number of the SHPOs cited weaknesses relating to this assistance. These weaknesses included slow response time, cumbersome guidelines, lack of local awareness, crisis orientation, lack of flexibility in resolving differences, and a tendency to impose personal biases.

Some SHPOs suggested that the Advisory Council could provide more explanation and direction and equated this inadequacy with the lack of Advisory Council funding and staffing.

Question 3b: Has the guidance and assistance you received from the Department of the Interior been adequate?

Answer 3b: Yes - 15 (Miss., Tex., Wis., Ut., Oh., La.,
Minn., Id., Tenn., Kans., Ala., Hi.,
N.J., R.I., and American Samoa)

No - 11 (N.D., N.Y., Mich., Mont., Ga., W. Va.,
S.D., Wash., Mass., N.C., and Wyo.)

No response to the question - 6 (Ariz., Ark.,
Ill., Ia., Md.,
and Nev.)

Nearly half of the SHPOs responding to the questionnaire held a favorable view of the assistance they have received from Interior. For example, the SHPOs cited the high quality of Interior's technical publications, assistance on SHPOs' comprehensive planning, rapid response to SHPO inquiries, and technical assistance regarding the tax incentive program.

The SHPOs also cited a number of weaknesses in Interior's guidance and assistance. These included inordinate delays in performing project reviews, poor technical assistance regarding the administration of historic preservation fund grants, unclear NPS guidelines for nominations to the National Register, slow responses from NPS' keeper of the National Register, insufficient written direction and guidance relating to the section 106 review and compliance process, differences between NPS headquarters and field offices in their interpretation of Interior's guidelines, too few staff to provide adequate technical assistance, and lack of awareness of local matters.

Question 4: Have federal agencies incorporated professional staff and planning standards into their historic preservation activities?

Answer 4: The SHPOs generally did not provide direct, unqualified responses to this question. Regardless of whether the SHPOs expressed a generally negative or positive impression of agency planning and staffing, their responses were frequently so heavily qualified that tabulation into clearly defined yes or no categories was not possible. Consequently, we believe it would be more informative to provide examples of some of the typical SHPO remarks, which follow:

--There is a great deal of difference among federal agencies with respect to the quality of their planning activities and the professionalism of their staff. Progress has taken place in several agencies where qualified historians and archeologists have been hired to develop workable master plans. Overall, however, many, if not most, federal agencies view historic preservation as an activity any staff member can accomplish with or without the training and experience required of the states by Interior (Oh.).

--The degree of performance in these areas varies by agency. Some do well, but most do

not have enough historic preservation personnel, and some agencies do not have any qualified personnel. Where an agency has no qualified personnel on board, it seldom, if ever, has worked good planning standards into its system (N.D.).

--Over the last 10 years, the level of professionalism of the federal agency staffs who deal with or administer historic preservation activities has risen. In the past few years, however, budget cuts, personnel ceilings, and fiscal concerns have halted this trend. In general, land management agencies do a better job of incorporating historic preservation planning into their normal functions than regulatory agencies (Wis.).

--Certain federal agencies have hired staff specifically for cultural resource management but no federal agency has drafted or implemented a comprehensive plan for managing cultural resources on an agencywide basis (N.Y.).

--COE has staffed its district offices with professionally trained personnel, but other agencies for the most part have not. As a result, planning for most agencies is almost nonexistent and historic properties are considered when a pressing need develops rather

than as part of a well-thought-out program (Tex.).

Question 5a: GAO reported in 1981 that federal agencies, the states, and archeologists could not agree on how much data recovery was enough. Does this problem still exist in your state?

Answer 5a: Yes - 9 (Miss., Md., Minn., Tenn., S.D., Wash., Hi., Wyo., and N.J.)

No - 20 (Tex., Wis., Ut., Ariz., Ill., N.D., N.Y., Mont., Mich., Oh., La., Ga., Ia., Ark., Kans., Ala., Mass., Nev., N.C., and R.I.)

No response to the question - 3 (Id., W.Va., and American Samoa)

The majority of SHPOs indicated that disagreements between archeologists, federal agencies, and states over the extent of data recovery are no longer a problem. One SHPO that indicated such disagreements were still a problem, believed it was unlikely that this question would ever be completely laid to rest, while another was more specific, stating that disagreements have arisen over principles, ultimate goals, and strategies for research.

Question 5b: What action has the state taken to avoid disagreement over how much data recovery is enough?

Answer 5b: Eighteen of the 20 SHPOs that indicated no problems exist over how much data recovery is enough cited actions that had been taken to help solve the problem. For example:

--SHPO has begun developing comprehensive archeological and historic preservation plans (S.D., Tenn., W.Va., and Wash.)

--SHPO staff have held workshops for federal agencies, industry, and archeologists to provide a forum for differences of opinion (Tex.).

--SHPO applies Advisory Council guidelines and works closely with agencies, local sponsors, and archeologists when drafting and reviewing project scopes of work (Wis.).

--Data recovery plans submitted by an agency's consultant must be approved by the agency and the SHPO (Ariz.).

--State, federal, and private sector archeologists work together in the development of a unified program (Ut.).

--Study units were developed by the SHPO, using Interior guidance, to address specific questions at the data recovery level (Oh.).

--Data recovery plans were established in consultation with the archeological community and the state's major construction agencies (N.Y.).

Question 5c: Are Interior's archeology directives specific enough to ensure that states and federal agencies are consistent in the amount of data recovery now required?

Answer 5c: Only 15 SHPOs responded to this question. Of those, 10 said they believed that Interior's archeology directives were specific enough (Tex., Ill., Mich., La., Minn., Id., Tenn., W.Va., Nev., and R.I.) and 5 believed the directives were not specific enough (Ariz., Miss., Mont., Oh., and Wyo.). However, some SHPOs qualified their "yes" or "no" answers as follows.

--Yes, Interior's directives are probably as specific as they can be for a nationwide program (Tex.).

--Yes, the problem is not with the directives but in the variability of the situations (Minn.).

--No, Interior's guidelines must be interpreted and expanded upon by SHPOs and federal agencies to create uniformity (Miss.).

--No, but this is not a fault. They are general enough to allow flexibility in approaches, yet specific enough to provide minimum standards. However, the amount of data recovery required is not standardized by agencies (Ariz.).

Question 6a: If the matching grants to the states from the historic preservation fund were discontinued, what impact would this have on those activities now being carried out by the SHPOs?

Answer 6a: Thirty-one of the 32 SHPOs stated that discontinuance of the historic preservation fund grants would cause a drastic reduction in or termination of SHPO staff and the services they provide the federal and state agencies.

Question 6b: What programs would be cut or eliminated if the matching grants to the states from the historic preservation fund were discontinued?

Answer 6b: The programs identified for reduction or elimination varied from one SHPO to another. The following is a listing of those programs or activities that were mentioned most frequently as the ones that would be reduced or eliminated:

- Consultations and section 106 reviews
(17 SHPOs).
- Surveys and inventories of culturally significant sites (14 SHPOs).
- Certifications of local government programs
(13 SHPOs).
- State participation in the federal tax
incentive project review process (13 SHPOs).
- National Register nominations including
district and multiple resource nominations
(11 SHPOs).
- State comprehensive historic preservation
planning (eight SHPOs).
- Information and technical assistance to the
public (five SHPOs).

Question 6c: What state-funded preservation activities would remain?

Answer 6c: The SHPOs said that a variety of programs and activities would probably be maintained, but the SHPOs emphasized that for the most part, they would be state-oriented activities such as the management of the state historic marker program, the research and designation of state landmarks,

and the state antiquities law review process. One major federal program activity identified for likely continuance by 17 SHPOs was the surveying and processing of National Register nominations.

Question 7: How would the elimination of preservation grants to the states affect federal agencies and their programs?

Answer 7: Of the 32 SHPOs responding to the questionnaire, 24 said that cutbacks in federal grants to states would lead to reduced state historic preservation activity. According to 12 SHPOs, this would necessitate shifting the burden for performing many historic preservation tasks, currently performed by the states, back to the federal agencies. Several tasks mentioned by the SHPOs were (1) providing assistance concerning applications for historic preservation tax incentives, (2) conducting surveys of proposed project sites, and (3) reviewing agency plans for compliance with historic preservation guidelines. A number of SHPOs believed it would cost federal agencies far more to perform these duties than would be saved by eliminating the grants. Accordingly, they believed the federal government is getting a bargain with its grant funds and that ending the grants would quickly be recognized as a false economy.

Question 8a: If the historic preservation tax credit were discontinued, what would be its impact on the rehabilitation of historic structures in your state?

Answer 8a: Of the 32 SHPOs responding, 28 held the view that without federal tax incentives, both the quantity and quality of historic building rehabilitation would suffer seriously. Several SHPOs, including Georgia, Idaho, and West Virginia, noted that rehabilitation of historic structures in urban areas in particular would become uneconomical without the incentives and therefore would not be undertaken. In general, the SHPOs believed that historic buildings would deteriorate and demolitions would increase if private developers were not offered preservation tax incentives.

Question 8b: If the historic preservation investment tax credit were discontinued, what would be its impact on the SHPOs' ability to influence rehabilitation activity?

Answer 8b: Of the 32 SHPOs responding to the questionnaire, 16 did not provide an explicit answer to this question. The 16 SHPOs that responded held the unanimous view that their influence would be lessened significantly.

Question 9a: What has been the impact in your state of not having federal grants-in-aid for acquisition and development for the past 5 years?

Answer 9a: Seventeen SHPOs indicated that the lack of federal grants has resulted in a significantly reduced level of building rehabilitation activity. Three other SHPOs (Ia., Wash., and W.Va.) did not say that rehabilitation activity had declined but they did say that some structures are deteriorating badly because there have been no funds to pursue preservation actions. Of the remaining 12 SHPOs, 6 did not specifically identify any reductions in the level of activity and 6 did not respond to the question.

Question 9b: In your state, have there been state or private sector efforts to create substitute grants?

Answer 9b: Yes - 12 (Miss., Tex., Ut., Ariz., Md., Ill., W.Va., Mass., N.C., Wyo., N.J., and R.I.)

No - 17 (Wis., N.D., N.Y., Mich., Oh., La., Minn., Ga., Id., Tenn., Ia., S.D., Ark., Wash., Kans., Ala., and Nev.)

Did not answer question - 3 (Hi., Mont., and American Samoa)

Some SHPOs that answered yes indicated the effort was not adequate (Ariz., Ill., Md., and Ut.)

Question 9c: Should grants-in-aid for acquisition and development of historic properties be restored?

Answer 9c: Yes - 27 (Miss., Tex., Wis., Ut., Ariz., Md.,
Ill., N.D., N.Y., Mich., Oh., La.,
Minn., Ga., Tenn., W.Va., Ia., S.D.,
Ark., Wash., Ala., Hi., Mass., Nev.,
N.C., Wyo., and N.J.)

No - 1 (Mont.)

Did not answer question - 4 (Id., Kans., R.I.,
and American Samoa)

While the SHPOs cited a variety of reasons why the grant program for acquisition and development should be maintained, the most frequently cited reason involved the leveraging power offered by the federal money. A number of the SHPOs made the point that federal grant funds provide them with important bargaining chips or seed money to lure considerably more private investment to preservation projects, thereby making them possible. Other reasons given for restoring acquisition and development grants-in-aid were as follows:

--The program creates jobs and results in economic revitalization.

--The program heads off major problems by providing the means to undertake projects before historic buildings reach a critical state of deterioration.

--The program is a highly visible one that can be used as a tool to educate the public regarding historic preservation concepts.

--There is no other mechanism for preserving National Register archeological sites.

Question 10a: What experience has your state had with the Certified Local Government (CLG) program?

Answer 10a: Of the 32 SHPO responses, 15 indicated some experience with the CLG program. Seven SHPOs (Miss., Wis., Vt., Oh., Id., Mass., and Tex.) indicated that cities were being certified or applications were pending. Several of these SHPOs described the CLG program as positive or working well. Eight SHPOs (Md., N.D., N.Y., Mont., Mich., La., N.Y., and N.J.) indicated they either had a disappointing experience or were experiencing difficulties with the CLG program.

Of the 17 remaining SHPOs with little or no experience with the program, three (Ala., Kans., and American Samoa) expressed little or no interest in future participation in the program.

Question 10b: What strengths has your state observed concerning the CLG program?

Answer 10b: Some of the strengths mentioned by the SHPOs are as follows:

- The integration of local and state preservation activities has given local preservation planners more leverage within their own areas.
- Coordinated efforts have increased among the various levels of government.
- The SHPO has become familiar with the preservation processes and policies at the local level.
- Flexibility is offered to the states to implement the program as it seems best in their state.

Question 10c: What weaknesses has your state observed concerning the CLG program?

Answer 10c: SHPOs tended to cite more weaknesses than strengths with the CLG program. The most often mentioned weakness was that both the act and Interior's regulations placed too many restrictions on the communities for the financial benefits currently derived from the CLG. SHPOs stated that, as a result, many communities see no reason to bother with it. The following were some of the other weaknesses or complaints mentioned by the SHPOs:

- Guidance received from National Park Service (NPS) regional offices concerning the CLG

program regulation has been mixed, confusing, and contradictory.

--NPS has advised Indian tribes that they do not qualify as CLGs under the 1980 amendments to the National Historic Preservation Act (NHPA).

--Small towns cannot meet NHPA requirements for participation.

--The CLG program has increased SHPO responsibilities without providing the SHPOs the additional funding needed to administer it.

--Local government people are untrained and do not know what to do with the money they get.

--No flexibility exists in the program to allow for several CLGs to share the expenses of one historic preservation program administrator.

Question 10d: What changes would you recommend to the CLG program?

Answer 10d: The following are some of the changes recommended by the SHPOs:

--Adequately fund the CLG program.

- Remove the restrictive rules regarding spending at the local level.
- Amend the law to ensure that CLGs have available for their use all funds which a state receives through its annual apportionment even if the state ceases participating in the National Register program.
- Place more of the authority for the CLG program with the states rather than with NPS.
- Modify the law and regulations to enable Indian tribes to qualify as CLGs.

Question 11: Have you been able to respond to federal requests within the requested or required time frames?

Answer 11: Twenty-three of the SHPOs stated that with few exceptions they are able to respond to federal agency calls for project reviews within required timeframes. (Miss., Tex., Ut., Ariz., Md., N.Y., Mont., Mich., Oh., La., Minn., Tenn., Ia., S.D., Ark., Wash., Kans., Ala., Mass., Nev., R.I., N.D., and American Samoa).

In those cases where the SHPOs indicate timeliness problems, they attributed these delays to two primary causes. First, they said that federal agencies requesting section 106 reviews do not always provide sufficient documentation on

the proposed activity to enable the SHPO to make an informed judgment. In these instances, the SHPOs have to ask the agencies to submit additional documentation, sometimes at the expense of considerable time delays. Second, some SHPOs said they have insufficient staff to handle peak workloads and this sometimes results in delayed reviews and responses to agencies. Also mentioned as factors contributing to longer response times were the increase in compliance workload and the decline in federal preservation grant funds.

Question 12: What changes would you make to improve the performance of state and federal agencies under the NHPA or other related authorities?

Answer 12: Twenty-eight of the 32 SHPOs responding offered recommendations on how to improve some aspect of the historic preservation activity. The recommendations offered by the SHPOs ranged widely. The following are some of those mentioned:

- Establish a permanent, reliable, and appropriate funding base for state programs through an endowed trust fund.

- Simplify requirements for CLGs.

- Clarify and strengthen the language of section 106 so that attempts to weaken the Advisory Council's role can be blocked.
- Eliminate requirements of section 4(f) of the Federal Highway Administration Act.
- The CLG set-aside funds should be available for use by the state for any eligible National Register program activity if (1) there are no CLGs in the state as of the date of apportionment award or (2) any such funds have not been applied for by qualified CLGs as of the date of the apportionment award.
- Reduce the requirements for matching funds and restore the federal appropriation to the level of a decade ago.
- Determine the proper placement of the NHPA program in the federal government.

LISTING OF THE STATES AND TERRITORIES
WHOSE HISTORIC PRESERVATION OFFICES RESPONDED
TO THE SUBCOMMITTEE'S QUESTIONNAIRE

OFFICES WHOSE RESPONSES WERE RECEIVED BY NOVEMBER 18, 1985,
AND INCLUDED IN THIS FACT SHEET:

Alabama (Ala.)	Nevada (Nev.)
Arizona (Ariz.)	New Jersey (N.J.)
Arkansas (Ark.)	New York (N.Y.)
Georgia (Ga.)	North Carolina (N.C.)
Hawaii (Hi.)	North Dakota (N.D.)
Idaho (Id.)	Ohio (Oh.)
Illinois (Ill.)	Rhode Island (R.I.)
Iowa (Ia.)	South Dakota (S.D.)
Kansas (Kans.)	Tennessee (Tenn.)
Louisiana (La.)	Texas (Tex.)
Maryland (Md.)	Utah (Ut.)
Massachusetts (Mass.)	Washington (Wash.)
Michigan (Mich.)	West Virginia (W.Va.)
Minnesota (Minn.)	Wisconsin (Wis.)
Mississippi (Miss.)	Wyoming (Wyo.)
Montana (Mont.)	American Samoa

OFFICES WHOSE RESPONSES WERE RECEIVED BETWEEN NOVEMBER 19, 1985,
AND DECEMBER 5, 1985, BUT NOT INCLUDED IN THIS FACT SHEET:

Alaska	Missouri (Mo.)
Colorado (Colo.)	Nebraska (Nebr.)
Delaware (Del.)	New Hampshire (N.H.)
District of Columbia (D.C.)	Oklahoma (Okla.)
Indiana (Ind.)	Pennsylvania (Pa.)
Kentucky (Ky.)	South Carolina (S.C.)

SHPO ASSESSMENTS OF FEDERAL AGENCY PERFORMANCE IN
CARRYING OUT THEIR HISTORIC PRESERVATION RESPONSIBILITIES

<u>Federal agency</u>	<u>Number of SHPOs believing agency was doing a good job (Question 1)</u>	<u>Number of SHPOs believing agency was not doing a good job (Question 2)</u>
Air Force	1	3
Army	3	3
Agricultural Stabilization & Conservation Service	-	1
Bureau of Indian Affairs	-	3
Bureau of Land Management	5	3
Bureau of Reclamation	2	2
Coast Guard	1	-
Department of Commerce	1	-
Comptroller of the Currency	-	2
Corps of Engineers (COE)	18	7
Department of Education	1	1
Department of Energy	-	2
Economic Development Administration	2	1
Environmental Protection Agency (EPA)	9	2
Federal Aviation Administration	2	-
Federal Communications Commission	1	4
Federal Deposit Insurance Corporation	3	3
Federal Emergency Management Agency	-	1
Federal Energy Regulatory Administration	3	4
Farmers Home Administration (FmHA)	9	4
Federal Highway Administration (FHWA)	13	5
Forest Service (FS)	9	6
Fish & Wildlife Service	3	3
General Services Administration (GSA)	2	7
Department of Health & Human Services	1	1
Department of Housing & Urban Development (HUD)	6	21
Minerals Management Service	-	1
Navy	1	4
National Park Service (NPS)	3	6
Office of Surface Mining (OSM)	1	6
Rural Electrification Administration	1	1
Small Business Administration	-	1
Soil Conservation Service	2	2
Urban Mass Transit Administration	1	-
U. S. Postal Service (USPS)	5	7
Veterans Administration (VA)	3	8
Western Area Power Administration	1	-

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